# **Industrial Pretreatment Quarterly**

Published for industrial dischargers by the King County Industrial Waste Program (KCIW)





Department of Natural Resources and Parks Wastewater Treatment Division Industrial Waste Program

Volume XXXIII: Issue 1 Spring 2008

#### **Mission Statement**

The mission of the Industrial Waste Program is to protect the environment, public health, biosolids quality, and King County's regional sewerage systems. We work cooperatively with our customers as we regulate industrial discharges, provide technical assistance, and monitor the regional sewerage system.

# **Industrial Waste Advisory Committee**

Christopher Arfman, Skills, Inc. Kevin Burrell, Environmental Coalition of South Seattle (ECOSS) Ken Falcone, Cargill, Inc. Dan Flick, Ralcorp Frozen Foods/ **Bakery Chef** Ken Gross, GM Nameplate Donna Hoskins, Bayer HealthCare Bill Hughes, Bellevue Community College Mark LaFata, Aerojet-General Jed Rusyniak, Coca-Cola Co. Steve Simacek, Hytek Finishes Heather Trim, People for Puget Sound Doris Turner, Boeing Commercial Airplane Group - Renton Chris VanHoof, City of Kent

# **2007 KCIW Rewards and Recognition Program**

(Awarded in 2008 and listed here throughout that year)

Scott Woerman, Landau Associates

#### **Commitment-to-Compliance Award**

Arco/BP Petroleum Products Co. Avtech Corp. Boeing Commercial Airplane - Renton Glacier Northwest Inc. - Kenmore

#### 2007 Gold Awards

Awarded in 2008 and listed here throughout the year
Acu-Line Corp.
Aero Controls Inc. - 20th Street NW
Alaskan Copper Works - 6th Avenue



# Industrial wastewater discharge approvals — the basics

In a given year, to protect public health and enhance the environment, the King County Industrial Waste Program (KCIW) works with over 1600 companies and other facilities that must comply with pretreatment regulations for discharging industrial wastewater. The program works with dental offices, construction sites, food processing companies, hazardous waste treatment facilities, groundwater remediation sites and contaminated stormwater dischargers as well as industrial manufacturers and other facilities.

KCIW administers industrial wastewater discharge approvals for over 600 businesses and facilities that discharge wastes into the King County wastewater treatment system. Types of approvals include permits, discharge authorizations (DAs), letters of approval and verbal approvals.

The program determines the type of approval by criteria including the nature of the business, the volume and characteristics of wastewater, and potential risk to the system. One goal is to carefully assess needs for program staff time spent on each approval to ensure that the program equitably recovers its administrative costs from all dischargers.

Wastewater discharge permits are more comprehensive than DAs, with both types of approvals generally requiring that permittees monitor discharges and include pretreatment requirements, discharge limits for specific pollutants and special conditions for sites. Permits deal with industrial categories

required by the federal government and dischargers of more than 25,000 gallons per day (gpd) called Significant Industrial Users (SIUs). The majority of permit holders in the county are metal finishing and food processing companies. KCIW administers an average of 130 permits annually to SIUs at a current fee of \$1675 for five years.



(Continued on page 4)

## **KCIW Updates**



#### **Public Rule adoption**

KCIW is in the process of adopting Public Rules pertaining to Industrial Waste Local Discharge Limits, the Industrial Waste Enforcement Response Plan, and Discharging Hauled Waste at a King County Publicly Owned Treatment Works Treatment Plant. Some of these changes are proposed to comply with the 2005 amendments to the U.S. Environmental Protection Agency's (EPA's) General Pretreatment Rules.

Notice of the 45-day public comment period, ending on March 24, was sent to the mailing list for this publication, many other parties, and published in the Seattle Times. Public hearings were planned for March 4 and 11.

If public comment were to result in a substantial difference from the proposed rule, the program would be required to conduct a new public comment process. Otherwise, the rules will be adopted in approximately mid-2008.

For more information go to: http://dnr.metrokc.gov/wlr/indwaste/useful.htm or contact KCIW Compliance Investigator Jim Sifford or e-mail: jim.sifford@ kingcounty.gov or by calling 206-263-3008.

#### KCIW comments on EPA's '08 Effluent Guidance Plan

The U.S. Environmental Protection Agency (EPA) issues a Preliminary Effluent Guidelines Program Plan (EGP) - every two years that addresses both effluent standards and pretreatment guidelines. The agency looks both at possible adjustments to existing categorical standards and the development of new categorical standards for industries.

It is KCIW's practice to comment on proposed pretreatment regulations for any sectors in which it works with dischargers. When the EPA issued a Notice of Availability of Preliminary 2008 EGP that included two health services sectors - dental mercury and unused pharmaceuticals, KCIW made the following comments:

**Dental mercury** - Based on the program's experience KCIW argued that the additional resources that would be required to implement categorical standards are not justified.

**Unused pharmaceuticals** - KCIW's conclusion is that the methods being used to control the disposal of unused pharmaceuticals to the sewer can be as effective as, or even more effective than the use of categorical standards.

For more information go to http://dnr.metrokc.gov/wlr/indwaste/useful.htm (or later in 2008 view navigation bar for the "Regulatory" topic.) Or contact KCIW Program Officer Doug Hilderbrand at 206-263-3032 or e-mail: douglas.hilderbrand@kingcounty.gov.

#### (AWARDS-Continued from page 1)

Amgen Corp. - Bothell

A. O. Smith Water Products Co.

Arco/BP Petroleum Products Co.

Avtech Corp.

Ball Metal Beverage Container Corp.

Bayer HealthCare - Bothell

Bayer HealthCare - Seattle

Bayer HealthCare - Lynnwood

Boeing Commercial Airplane -North Field

Boeing Commercial Airplane - Renton

Carl Zapffe Inc.

Container Properties, LLC

Dawn Food Products Inc.

Exotic Metals Forming Co.

**Express Finishing** 

Genie Industries - Bldg. 2 - Moosewerks Plant

Glacier Northwest Inc. - Kenmore

GM Nameplate Inc.

Hexcel Corp.

Honeywell International Inc.

Hytek Finishes Co.

**Industrial Container Services** 

Interstate Brands Corp. - Hostess

Kenworth Truck Co.

King County Solid Waste Division-Cedar Hills Landfill

King County Wastewater Treatment Division - Brightwater Conveyance System

Magnetic and Penetrant Services
Co.

Mastercraft Metal Finishing Inc.

Metro Transit South Base/

Component Supply Center

Mikron Industries

Oberto Sausage Co. - Kent

Pacific Iron and Metal

Pioneer Industries

Precor Inc. - Plant 1

Precor Inc. - Plant 2

Prototron Circuits Inc.

Quality Finishing Inc.

Rexam Beverage Can Co.

Safeway Inc. - Bellevue Beverage Plant

Seattle Barrel Co.

Seattle Solid Waste - Kent

Highlands Landfill

Skills Inc. - Auburn Facility

Skills Inc. - Ballard Facility

Smith Fabrication Inc.

TOC Holdings Co.

Todd Pacific Shipyards Corp.

Tri-Way Industries
Universal Brass Inc.
Universal Manufacturing
Universal Sheet Metal Inc.
Vectra Fitness Inc.
Viox Corp.
Washington Technology Center
Weyerhaeuser Co.

#### 2007 Silver Awards

Awarded in 2008 and listed here throughout the year
Aerojet-General Corp.
Amgen Corp. - Seattle
The Boeing Co. - Plant 2 Facility
Boeing Electronics Center
Burlington Environmental - Kent
Burlington Northern Santa Fe
Railway - Interbay Facility
Cedar Grove Composting Inc.
Circuit Services WorldWide
Coca-Cola Bottling Co. of
Washington
Crane-Eldec Corp. - Martha Lake
Facility

Davis Wire Corp.

G & K Services

Genie Industries - Bldgs. 3 & 4

King County Wastewater Treatment Division - Brightwater Conveyance System II

Marine Vacuum Service

Pepsi-Cola Co.

Redhook Brewing Co.

Romac Inc.

WestFarm Foods/Darigold - Rainier

# KCIW's Rewards and Recognition Program (above)

Every year, King County recognizes significant industrial users of the sewer system that have maintained an excellent record of compliance with the county's industrial waste discharge regulations for the previous calendar year. For awards criteria and more information, go to: http://dnr. metrokc. gov/wlr/indwaste/Awards.htm.

King County's industrial pretreatment regulations are designed to prevent businesses from discharging substances that can degrade the wastewater treatment process, harm workers, damage facilities or reduce water quality.

#### A look ahead at 2008



#### By Despina Strong, KCIW program manager

As I write this in February, I know that these activities and many more will be underway later in the spring when you receive this newsletter, during a busy and productive year for our program:

- The EPA conducted a compliance inspection of the county's sanitary sewer system this January as authorized by the Clean Water Act. Our program participated by supplying selfmonitoring data and a summary of program monitoring data for the past five years. Program staff met with EPA representatives, giving them background on KCIW and its operations, with an emphasis on how it deals with areas with combined sewers. The results of that audit will probably be available later this year.
- This year we will be completing procedures for systemwide cost recovery from construction dewatering projects and contaminated industrial stormwater sites to ensure that all dischargers are paying sewer charges when appropriate.

(Continued on page 4)



# Watch for this icon for technical assistance tips

#### **About the Industrial Pretreatment Quarterly**

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Publication is available on the Internet at: http://dnr.metrokc.gov/wlr/indwaste/publicat.htm. For more information contact Doug Hilderbrand, KCIW Program Officer, at 206-263-3032 or TTY Relay: 711, or e-mail: douglas.hilderbrand@kingcounty.gov.

#### **Contact information:**

King County Industrial Waste Program (KCIW), 130 Nickerson St., STE 200, Seattle WA 98109-1658. PH: 206-263-3000 or TTY: 711.

http://dnr.metrokc.gov/wlr/indwaste

This material is provided in alternative formats upon request by calling 206-263-3000 or TTY relay: 711

## **2008 Industrial User Surveys**

EPA regulations require the county to implement procedures that identify all industrial and commercial users of the sewer system that discharge industrial wastes to King County's wastewater treatment plants. KCIW must also characterize the volume and type of pollutants that these businesses are discharging into the sewer system.

The main tool the program uses to locate potential industrial dischargers is an Industrial User Survey that asks about the company; manufacturing information; chemicals used; type and location of outlets to sanitary sewer and use of alternate waste disposal methods such as hazardous waste haulers.

The program compiles lists of potential dischargers to survey from sources such as the Harris InfoSource database, local sewer agencies, local newspaper classifieds advertising, databases of new business licenses, word-of-mouth referrals and field work incidents.

KCIW evaluates returned surveys to determine if businesses are potentially discharging industrial wastes. If so, the program follows up with site inspections to learn more about businesses' manufacturing processes and the chemicals in their wastewater discharges that may be subject to meeting local, state and federal industrial wastewater discharge regulations. The program may also inspect companies that do not reply to the surveys.

KCIW normally selects one or more industrial categories to evaluate throughout the county in a given survey project. The program will send metal finishing companies surveys in 2008.

KCIW appreciates the cooperation of area companies. When businesses properly dispose of wastewater, the Puget Sound region benefits from cleaner water and reduced wastewater treatment costs.

For more information contact KCIW Compliance Investigator Lydia Eng at 206-263-3017 or email: lydia.eng@kingcounty.gov.

#### A look ahead at 2008

(Continued from page 3)

- Regulations require our program's 2008 work surveying new metal finishing companies (see article on this page) and evaluation of other industry sectors – activities that may also help trace sources of pollutants.
- KCIW is pleased to have new sampling equipment that will enable staff to evaluate field data in real time as they control the equipment remotely through laptop computers. In the months ahead staff will be testing the new equipment, and then using it to troubleshoot system issues and to more effectively collect samples from difficult sites.

Also, we invite you to read about our work in setting local limits for the new Carnation Treatment Plant (page 5); our current process of adopting Public Rules (page 2) and our participation in IRAC's marble /granite cutting workgroup (page 7).

Thanks to all of our participating companies and facilities that help protect public health and enhance the environment!

For more information: contact KCIW Program Manager Despina Strong, e-mail: despina. strong@kingcounty.gov; phone 206-263-3010.



# Industrial wastewater Discharge approvals the basics (Continued from page 1)

Fees rise and fall from year to year, as the program annually reviews and resets all fees to recover the costs of operating the fee programs.

KCIW administers an average of 200 letters of approval annually to dischargers of generally less than 1,000 gpd. These approvals are issued to businesses and facilities that discharge industrial wastewater for a short period of time, such as construction dewatering projects. Verbal authorizations are normally issued for small and one-time discharges.

For more information about permits and fees, go to: http://dnr.metrokc.gov/wlr/indwaste/fees. htm or contact KCIW Program Officer Doug Hilderbrand at 206-263-3032 or e-mail: douglas. hilderbrand@kingcounty.gov.



# Developing local limits for Carnation Wastewater Treatment Plant



King County's Carnation Treatment Plant under construction, February 2008.

The City of Carnation has contracted with King County to build a state-of-the-art treatment plant that will treat up to 500,000 gallons of wastewater a day with advanced membrane bioreactor technology. The plant, which will come online in 2008, will have capacity to eventually serve up to 4,000 people, replacing Carnation's failing septic systems and protecting public health and the environment.

One of KCIW's responsibilities is to help set local limits for pollutants discharged to county treatment plants, including the plant in Carnation. Federal limits on pollutants discharged in wastewater by industry are designed to control pollutants, especially toxicants from industrial sources. A King County Public Rule specifies the local limits on certain pollutants that apply to all industries and facilities that discharge industrial wastewater to the county's sewage system.

This year KCIW will begin researching and evaluating data that will either support using the county's existing limits or indicate that proposed limits for the new Carnation plant need to be developed. The program's objectives in setting standards are:

- to prevent the introduction of pollutants which would interfere with the operation of the Carnation Treatment Plant
- to prevent pass-through of untreated incompatible pollutants that would violate applicable water quality standards and/or the NPDES permit requirements
- to prevent contamination of the plant's byproduct, biosolids, which would interfere with the county's goal of recycling 100% of this material.

To determine the limits, KCIW will need to understand what types of

pollutants industries may discharge to the new plant and which of those may be of concern.

The program will review state and federal water.

The program will review state and federal water

quality standards and criteria to determine effluent requirements for the specific toxicants

One of KCIW's responsibilities is to help set local limits for pollutants discharged to county treatment plants, including the plant in Carnation.

that it expects the industrial users of the sewer system to discharge. The program will also need to learn about levels of toxicants that could affect this particular plant's operations.

When KCIW's research is completed, the program will summarize its findings in a report to the Washington State Department of Ecology.

For more information about this process, contact KCIW Program Officer Doug Hilderbrand at doug.hilderbrand@kingcounty.gov or 206-263-3001. To learn more about the upcoming Carnation Treatment Plant, go to: http://dnr.metrokc.gov/WTD/carnation. Regulatory requirements for development of local limits are found in the EPA's General Pretreatment Standards detailed in 40 CFR 403 of the Federal Register.

## **Industrial Waste Advisory Committee (IWAC) Meeting**

Feb. 6, 2008

With the goal of protecting the environment, public health, biosolids quality and King County's regional sewage system, IWAC meets to exchange ideas among representatives of industrial wastewater dischargers, sewer agencies, environmental groups, and KCIW staff.

These were the meeting topics, with meeting notes on the Internet page indicated below:

- Brightwater Construction/Activities Update

   Michael Popiwny, project manager, King
   County Brightwater operations.
- 2. Interagency Resource for Achieving
  Cooperation (IRAC) and Interagency
  Compliance Team (ICT) Debra Oliver
  and Sue Hamilton, health & environmental
  investigators, Local Hazardous Waste
  Management Program in King County,
  and Dave Haberman, KCIW compliance
  investigator.

- About Industrial Waste Program fees for 2008 – Doug Hilderbrand, KCIW program officer.
- Update on King County's intent to adopt public rules and revise King County Code 28.84.060 (see page 2) – Jim Sifford, KCIW compliance investigator.
- **5. Round table discussion** Issues of importance to members– IWAC members.

For more information: contact KCIW Compliance Investigator Barbara Badger, e-mail: barbara. badger@kingcounty.gov; phone 206-263-3024. Meeting summaries are available at: http://dnr.metrokc.gov/wlr/indwaste/lwac.htm or by contacting KCIW, see page 3.

Remaining 2008 IWAC meetings will take place May 7, and November 5. Special accommodations can be arranged by request by calling 206-263-3000 or TTY: 711.

#### **Meet an IWAC member**

KCIW is presenting a series of profiles of its Industrial Waste Advisory Committee (IWAC) members.



Ken Gross

Ken Gross is the environmental coordinator for GM Nameplate, Seattle. Responsible for managing all aspects of environmental compliance that include air, water and waste permitting issues, Ken also conducts hazardous waste and safety training for employees. Ken was instrumental in GM Nameplate's winning Ecology's 2000 Governor's Pollution Prevention Award. He serves on KCIW's Industrial Waste Advisory Committee and presented about GM Nameplate's lean manufacturing techniques at KCIW's most recent technical assistance workshop.

#### **GM Nameplate:**

One of the largest privately owned companies in the state.

**Produces:** printed labels, signs and electronic assemblies (screen printing, spray painting, decorative electroforming, digital graphics, film developing, litho and pad printing.

Discharges: 11,730 gallons per day

## IRAC to address marble and granite cutting industry

The Interagency Resource for Achieving Cooperation (IRAC) provides a forum for government regulators to identify and resolve gaps, overlaps and conflicts with other agencies' regulations. Participants include staff from numerous local, regional, state and federal agencies.

KCIW is a part of a new IRAC workgroup formed to develop and distribute information regarding Best Management Practices (BMPs) for the marble and granite cutting industry.

The group of regulatory agency representatives shares ideas, concerns and recommendations for businesses to maintain compliance with local and state regulations for the marble and granite cutting industry. The workgroup plans to write and distribute a guide detailing BMPs for business owners to get its message out on a large-scale basis.



counter-top installation in new residential and commercial buildings. Some of the environmental issues pertaining to marble and granite cutting are: worker exposure and safety; water quality degradation; illegal industrial waste discharges and air quality impacts.

Marble and granite can be cut using either a wet or dry process. The dry process may be of more concern to air quality regulators and the Washington State Department of Labor and Industries due to fugitive dust and worker exposure. The more popular wet process has water quality issues related to discharges to the storm water system and sanitary sewer, as the wastewater is often turbid with high pH levels. Fine sediment generated during the wet cutting process can settle into storm drains or sewer lines and may solidify into a concrete-like substance.

For either cutting process, by practicing BMPs this industry can help protect public health and the county sewer system and enhance the environment.

For more information contact KCIW Compliance Investigator Dave Haberman at 206-263-3007 or e-mail: dave.haberman@kingcounty.gov. IRAC's Web site is: http://www.lhwmp.org/IRAC/default.aspx.

## **Recent enforcement actions**

During the period covered by this report, November 2007 through January 2008, there were no facilities that had violations warranting publication. However, the program did act on three violations for companies that failed to file required reports by the established deadlines.

We all need to work together to prevent pollution. If you have information for the King County Industrial Waste Program or questions about our programs, please call 206-263-3032 or TTY: 711. You may also visit our program's pages at: http://dnr.metrokc.gov/wlrlindwastelindex.htm

## Resources for industrial wastewater dischargers...

#### **Shoptalk: A Publication for Dangerous Waste Managers**

Produced by the Washington State Department of Ecology's Hazardous Waste and Toxics Reduction Program. Find the newsletter on the Internet at: http://www.ecy.wa.gov/biblio/shoptalk.html. For alternate formats, call the Hazardous Waste and Toxics Reduction Program at 360-407-6700 or 711 for Washington Relay Service.



Department of Natural Resources and Parks **Industrial Waste Program** 130 Nickerson Street, Suite 200 Seattle, WA 98109-1658

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RETURN SERVICE REQUESTED

# Congratulations to KCIW's 2007 Rewards and Recognition Program winners!! (announced in 2008)

West Point Treatment Plant

See side columns pages 1-3 for a complete list

Thank you — your excellence in pretreatment greatly contributes to pollution prevention!

King County, Washington, protects water quality and prevents water pollution by providing wastewater treatment to 17 cities and 17 local sewer utilities. The county's Wastewater **Treatment Division** serves about 1.4 million people, including most urban areas of King County and parts of south Snohomish County and northeast Pierce County.